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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

SHIELDIO, INC.,

Plaintiff,

vs.

SIMON I. BAIN, an individual,

Defendant.

Case No. 3:19-cv-700-MMD-WGC

**STIPULATION AND ORDER  
EXTENDING TIME FOR PLAINTIFF  
TO RESPOND TO SIMON I. BAIN'S  
MOTION TO DISMISS COMPLAINT  
(SECOND REQUEST)**

Plaintiff ShieldIO, Inc. ("ShieldIO") and Defendant Simon I. Bain ("Bain"), through their counsel, hereby respectfully request the Court enter an order, pursuant to Local Rules IA 6-1 and 7-1 extending the time for ShieldIO to respond to Bain's motion to dismiss complaint (ECF No. 7) otherwise due January 27, 2020. The Parties previously stipulated to an extension of time, which the court granted, extending the deadline from December 27, 2019 to January 27, 2020. The Parties request that the time be extended to February 26, 2020.

The Parties continue to engage in good faith settlement discussions. However, the Parties have not yet settled on final terms due to the technical nature of the subject matter in suit. Additionally, the Parties were delayed in their settlement efforts by the intervening Holiday Season. Therefore, the stipulation and extension are made by the Parties in good faith for the benefit of each. The stipulation is made for the benefit of the Parties and the Court and not for any deleterious purposes nor to delay these proceedings. The Parties will submit a separate stipulation

1 and proposed order extending the deadline for the parties to hold the discovery conference under  
2 Rule 26(f) of the Federal Rules of Civil Procedure.

3 Dated: January 23, 2020

Dated: January 23, 2020

4 KNOWMAD LAW

SNELL & WILMER L.L.P.

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6 By: /s/ Christopher McElwain  
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19 **IT IS SO ORDERED.**

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UNITED STATES DISTRICT JUDGE

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23 DATED: January 23, 2020  
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